

Exhibit 4

Rosenbaum Declaration

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|---|---|------------------------|
| ----- |) | |
| In re: |) | Case No. 12-12020 (MG) |
| |) | |
| RESIDENTIAL CAPITAL, LLC, <u>et al.</u> , |) | Chapter 11 |
| |) | |
| Debtors. |) | Jointly Administered |
| ----- |) | |

**DECLARATION OF NORMAN S. ROSENBAUM IN SUPPORT OF
DEBTORS' OBJECTION TO PROOFS OF CLAIM FILED AGAINST
RESIDENTIAL CAPITAL, LLC BY (I) RUTH ASSORGI (CLAIM NO. 2580);
(II) JOHN R. FOSTER AND ELIZABETH FOSTER (CLAIM NO. 2581) AND
(III) MARK MOODY AND SHERRILL MOODY (CLAIM NO. 2583)**

Norman S. Rosenbaum, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury:

1. I am a partner in the law firm of Morrison & Foerster LLP ("M&F"). M&F maintains offices for the practice of law, among other locations in the United States and worldwide, at 1290 Avenue of the Americas, New York, New York 10104. I am an attorney duly admitted to practice before this Court and the courts of the State of New York. By this Court's Order entered on July 16, 2012, M&F was retained as counsel to Residential Capital, LLC and its affiliated debtors (the "**Debtors**").

2. I submit this declaration (the "**Declaration**") in support of the *Debtors' Objection To Proofs Of Claim Filed Against Residential Capital, LLC By (I) Ruth Assorgi (Claim No. 2580); (II) John R. Foster And Elizabeth Foster (Claim No. 2581) And (III) Mark Moody And Sherrill Moody (Claim No. 2583) Pursuant To Section 502(b) Of The Bankruptcy Code And Bankruptcy Rule 3007* (the "**Objection**") and in compliance with this Court's Order entered March 21, 2013, pursuant to section 105(a) of Title 11, United States Code (the "**Bankruptcy Code**") and Rules 1009, 3007 and 9019(b) of the Federal Rules of Bankruptcy Procedure

approving: (i) Claim Objection Procedures; (ii) Borrower Claim Procedures; (iii) Settlement Procedures; and (iv) Schedule Amendment Procedures [Docket No. 3294] (the “**Claim Objection Procedures Order**”).

3. It is my understanding that in connection with the filing of the Objection, the Debtors have complied with the Claim Objection Procedures Order. I have been advised by attorneys under my supervision that in accordance with the Claim Objection Procedures Order, prior to filing the Objection, the Debtors mailed request letters to (a) Ruth Assorgi (“**Assorgi**”), (b) John R. Foster and Elizabeth Foster (the “**Fosters**”), and (c) Mark Moody and Sherrill Moody (the “**Moodys**” and, together with Assorgi and the Fosters, “**Claimants**”) to request additional supporting documentation and explanation in support of, respectively, Claim No. 2580 (the “**Assorgi Claim**”), Claim No. 2581 (the “**Foster Claim**”), and Claim No. 2583 (the “**Moody Claim**” and, together with the Assorgi Claim and the Foster Claim, the “**Claims**”). I am further advised that the Debtors conferred with SilvermanAcampora LLP as Special Counsel to the Creditors’ Committee for Borrower Issues (“**Special Counsel**”) in drafting the request letters and provided Special Counsel with copies of the request letters sent to the Claimants.

4. To the best of my knowledge, prior to the filing of the Objection, both the Debtors and Special Counsel have fully complied with all other relevant terms of the Claim Objection Procedures Order.

Dated: September 20, 2013
New York, New York

/s/ Norman S. Rosenbaum
Norman S. Rosenbaum